



March 20, 2025

**VIA ELECTRONIC CASE FILING**

Honorable Hector Gonzalez  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: KAIA BATTLE v. UNITED STATES OF AMERICA, THE PORT  
AUTHORITY OF NEW YORK AND NEW JERSEY, JOHN DOES 1-4  
Civil Action No.: 1:25-cv-1166-HG**

Dear Judge Gonzalez:

This office represents defendant Port Authority of New York and New Jersey in the above-referenced action, and I am the assigned attorney. I am writing to request an extension of time to respond to the Summons and Complaint in this case.

The original answer date in this case is March 31, 2025, and I am writing to request an extension of time to April 30, 2025. One of our staff has spoken with the office of plaintiff's counsel, and they have agreed to grant this extension, which is defendant's first request for additional time. This extension of time does not affect any other scheduled dates. I thank the Court for consideration of this application.

Respectfully submitted,

/s/ David Kromm  
David Kromm, Esq.  
Litigation  
(212) 435-3483

cc: Sara J. Wolkenstorfer, Esq.  
Attorneys for Plaintiff  
(via ECF)